KIRTON LAW FIRM

USDC SDNY

Marlon G. Kirton, Esq.

Nassau County: 175 Fulton Avenue, Suite 305

Hempstead, New York 11550

Tel. # (516) 833-5617

Fax # (516) 833-5620

February 15, 2021

VIA ELECTRONIC FILING

Hon. Colleen McMahon Chief, U.S. District Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, New York 10007

Re: U.S. v. Jabron Green, 19 cr. 496 (CM)

Dear Chief Judge McMahon:

I represent Jabron Green in the above-referenced matter. Mr. Green pleaded guilty to a narcotics sale before Magistrate James L. Cott. This Court accepted his guilty plea. The sentencing hearing is scheduled for March 25, 2021. Mr. Green is currently at liberty. I request an adjustment of Mr. Green's bail conditions to allow him to take a one-day trip to visit his son in Pennsylvania.

Mr. Green has the following bail conditions:

1. Defendant must execute a \$100,000 PRB, co-signed by three (3) financially responsible persons, and secured by his wife's Manhattan coop; 2. Defendant's supervision will include home detention with electronic monitoring; 3. Defendant is to maintain employment; 4. Defendant's travel is restricted to the SDNY and the EDNY; 5. Defendant must surrender all passports and make no new applications; 6. Defendant must submit to drug testing at the discretion of the Probation Department; and 7. Defendant must comply with all of the other standard conditions of pretrial release.

Mr. Green's son is a student at Lehigh University in Bethlehem, Pennsylvania. He and his wife will drive to visit him on February 16, 2021, and return the same day. Both pretrial services and the Government have approved this request. Mr. Green is employed and is in compliance with the conditions of his bail. I apologize for the lateness of this request. Mr. Green approached us last week concerning this issue, but there were delays in my office that prevented this letter from being sent out earlier than today.

Please contact me if you have any questions or concerns.

Sincerely,

s/Marlon G. Kirton Marlon G. Kirton, Esq.

cc: Timothy Capozzi, Assistant United States Attorney (via electronic mail)
Maurene Comey, Assistant United States Attorney (via electronic mail)
Aline Flodr, Assistant United States Attorney (via electronic mail)
D. Andrew Marshall, Esq. (via electronic mail)